

**TRIAL EXHIBITS NOT ADMITTED**

**WR Grace:**  
**All Parties Trial Exhibit List - NOT Admitted Exhibits**

<u>Party</u>	<u>Ex. No.</u>	<u>Bates Span</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Confidential</u>	<u>Objections</u>	<u>Proffer</u>
Anderson Mem. Hosp.	AMH 004	AMH-0047- AMH-0166	02/00/1988	EPA Study of Asbestos-Containing Materials in Public Buildings - A Report To Congress	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 005	AMH-0167- AMH-0353	06/01/1988	Final Report Assessing Asbestos Exposure in Public Building EPA No. 560-5-88-002	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 006	AMH-0354- AMH-0443	12/22/1922	Letter from Charles Powers to The Docket Officer re Asbestos in Public and Commercial Buildings: Supplementary Analyses of Selected Data Previously Considered by the Literature review Panel	No	PP Obj: Hearsay; Relevance; Best Evidence	
Anderson Mem. Hosp.	AMH 011	AMH-0531- AMH-0539	07/00/1990	Asbestos Abatement Magazine re For Whose Safety: The Safe Buildings Alliance	No	PP Obj: Hearsay; Relevance; Lawyer Argument (Runyan Author)	
Anderson Mem. Hosp.	AMH 012	AMH-0540- AMH-0588	07/00/1990	Managing Asbestos in Place - A Building Owner's Guide to Operations and Maintenance Programs for Asbestos Containing Materials	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 013	AMH-0589- AMH-0592	12/03/1990	Authentication of Joseph S. Carra	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 015	AMH-0622- AMH-0623	12/27/1990	Authentication of Mark A. Greenwood	No	PP Obj: Hearsay; Relevance	

\*AXA Belgium (23082); FFIC/Allianz (23105) and Federal Insurance (23109) Join in the Objections of GEICO, Republic, Seaton and OneBeacon outlined herein.

**WR Grace:**  
**All Parties Trial Exhibit List - NOT Admitted Exhibits**

<u>Party</u>	<u>Ex. No.</u>	<u>Bates Span</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Confidential</u>	<u>Objections</u>	<u>Proffer</u>
Anderson Mem. Hosp.	AMH 019	AMH-1044- AMH-1047	05/15/1991	Letter from Robert McNally, Chief, Assistance Programs Development Branch, Environmental Assistnace Division, USEPA to Scott Schneider, Occupational Health Foundation, re EPA Guide 'Managing Asbestos in Place' (Green Book)	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 020	AMH-1048- AMH-1049	04/02/1991	56 Fed. Register 83, Environmental Protection Agency Notice of advisory to public re potential health risks of asbestos exposure and EPA's policies for asbestos control in schools and other buildings	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 027	AMH-1092- AMH-1096	07/30/1992	Letter from Linda Fisher, Assistant Administrator, USEPA, to Mariene Marshall, Minnesota Dep't of Health, re EPA's approach re asbestos in schools and other buildings	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 028	AMH-1097- AMH-1099	10/05/1993	58 Fed. Register No. 31 - Environmental Protection Agency - Asbestos NESHAP Clarification of Intent re removal of asbestos-containing materials	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 029A	AMH-1100- AMH-1166	01/02/1998	Anderson Memorial's Motion to Certify a Class Action w/attached Plaintiff's Memorandum in Support of Motion to Certify A Class Action (from Anderson Memorial South Carolina State Court case)	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 029B	AMH-1167- AMH-1582	04/17/1998	Plaintiff's Repy in Support of Motion to Certify A Class Action with exhibits (from Anderson Memorial South Carolina State Court case)	No	PP Obj: Hearsay; Relevance	

\*AXA Belgium (23082); FFIC/Allianz (23105) and Federal Insurance (23109) Join in the Objections of GEICO, Republic, Seaton and OneBeacon outlined herein.

**WR Grace:**  
**All Parties Trial Exhibit List - NOT Admitted Exhibits**

<u>Party</u>	<u>Ex. No.</u>	<u>Bates Span</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Confidential</u>	<u>Objections</u>	<u>Proffer</u>
Anderson Mem. Hosp.	AMH 029C	AMH-1583- AMH-1640	04/19/2000	Plaintiff's Pre-Hearing Memorandum on Class Certification (from Anderson Memorial South Carolina State Court case)	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 029D	AMH-1641- AMH-2187	08/31/2000	Affidavit of Marion C. Fairey, Jr. (from Anderson Memorial South Carolina State Court case)	No	PP Obj: Relevance; Best Evidence; Hearsay; Improper Designation in Violation of Fed. R. Civ. Proc. 32 and the 4th Amended CMO	
Anderson Mem. Hosp.	AMH 030A	AMH-2188- AMH-2288	03/03/1998	Defendants' Memorandum in Opposition to Class Certification (from Anderson Memorial South Carolina State Court case)	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 030B	AMH-2289- AMH-2352	05/03/2000	Certain Defendants' Consolidated Brief in Opposition to Class Certification (from Anderson Memorial South Carolina State Court case)	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 030C	AMH-2353- AMH-2500	10/23/2000	Certain Defendants' Post-Hearing Brief in Opposition to Class Certification (from Anderson Memorial South Carolina State Court case)	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 030D	AMH-2501- AMH-2559	02/08/2001	Certain Defendants' Further Post-Hearing Brief in Opposition to Class Certification (from Anderson Memorial South Carolina State Court case)	No	PP Obj: Hearsay; Relevance	
Anderson Mem. Hosp.	AMH 031	AMH-2560- AMH-2579	03/25/1999	Plaintiff W.R. Grace & Co.-Conn.'s Trial Brief (from Anderson Memorial South Carolina State Court case)	No	PP Obj: Hearsay; Relevance	

\*AXA Belgium (23082); FFIC/Allianz (23105) and Federal Insurance (23109) Join in the Objections of GEICO, Republic, Seaton and OneBeacon outlined herein.

**WR Grace:  
All Parties Trial Exhibit List - NOT Admitted Exhibits**

<u>Party</u>	<u>Ex. No.</u>	<u>Bates Span</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Confidential</u>	<u>Objections</u>	<u>Proffer</u>
Anderson Mem. Hosp.	AMH 032A	AMH-2580- AMH-2868	09/05/2000	Transcript of Anderson Memorial Hospital's Class Certification Hearing (Anderson Memorial South Carolina State Court case)	No	PP Obj: Hearsay; Relevance; Legal Argument; Improper Designation in Violation of Fed. R. Civ. Proc. 32 and the 4th Amended CMO	
Anderson Mem. Hosp.	AMH 032B	AMH-2869- AMH-3110	09/06/2000	Transcript of Anderson Memorial Hospital's Class Certification Hearing (Anderson Memorial South Carolina State Court case)	No	PP Obj: Hearsay; Relevance; Legal Argument; Improper Designation in Violation of Fed. R. Civ. Proc. 32 and the 4th Amended CMO	
Anderson Mem. Hosp.	AMH 032C	AMH-3111- AMH-3129	05/06/1996	Order Regarding Estimation of Asbestos Property Damage Claims for Voting Purposes (from Celotex Bankruptcy case)	No	PP Obj: Relevance; Court has already ruled that claims resolution in the Celotex case is not relevant (09/14/2009 Tr. at 153)	
Anderson Mem. Hosp.	AMH 032D	AMH-3130- AMH-3132	00/00/0000	Graphs re Summary of Speights & Runyan Asbestos Property Damage Results for Clients	No	PP Obj: Authenticity; Relevance; Hearsay; Best Evidence	
Anderson Mem. Hosp.	AMH 032E	AMH-3133- AMH-3192	00/00/0000	Chart titled: Grace Asbestos Products Sold in South Carolina	No	PP Obj: Authenticity; Relevance; Hearsay; Best Evidence	
Anderson Mem. Hosp.	AMH 032F	AMH-3193- AMH-3618	01/10/1972	Zonolite Monthly Billing Register	No	PP Obj: Hearsay; Relevance	

\*AXA Belgium (23082); FFIC/Allianz (23105) and Federal Insurance (23109) Join in the Objections of GEICO, Republic, Seaton and OneBeacon outlined herein.

**WR Grace:**  
**All Parties Trial Exhibit List - NOT Admitted Exhibits**

<u>Party</u>	<u>Ex. No.</u>	<u>Bates Span</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Confidential</u>	<u>Objections</u>	<u>Proffer</u>
Anderson Mem. Hosp.	AMH 033	AMH-3619- AMH-3830	00/00/0000	Index to US Trustee Frank Perch's File and a copy of his file relating to the formation of the Asbestos Property Damage Committee in W.R. Grace	No	PP Obj: Authenticity; Relevance; Hearsay; Group Exhibit	
Anderson Mem. Hosp.	AMH 034A	AMH-3831- AMH-3909	05/07/2002	Motion of Debtors and Debtors in Possession for an Order (A) Establishing Bar Date for Filing Proofs of Claim on Account Adbestos-Related Damage to Property Located in The united States and Canada; (B) Approving Proposed Proof of Claim Form for Such Asbestos-Related Property Damage Claims; and (C) Approving Scope and Manner of Notice of Bar Date for Asbestos-Related Property Damage Claims (from Federal Mogul Bankruptcy case)	No	PP Obj: Relevance; Hearsay	
Anderson Mem. Hosp.	AMH 037	AMH-3988- AMH-4105	02/06/2004	Joint Motion of the Legal Representative and the Trust Advisory Committee to Intervene in Adversary Proceeding No. 02-521 (from Celotex Bankruptcy case)	No	PP Obj: Relevance; Hearsay; Court has already ruled that claims resolution in the Celotex case is not relevant (09/14/2009 Tr. at 153)	
Anderson Mem. Hosp.	AMH 041	AMH-4137- AMH-4138	07/14/2009	Memo from James Restivo, Jr. to Dan Speights re: W.R. Grace - Confirmation Hearing	No	PP Obj: Relevance; Fed. R. Evid. 408	
Anderson Mem. Hosp.	AMH 042	AMH-4139- AMH-4176	10/24/1995	Fax from Marc Wolinsky (Wachtell, Lipton, Rosen & Katz) to Jeffrey Posner enclosing presentation re: W.R. Grace BI and PD Cost Estimates: 1995 to 2039 prepared by KPMG Resource Planning Consultants.	No	PP Obj: Relevance; Hearsay; Unfairly Prejudicial; Fed. R. Evid. 701-704	

\*AXA Belgium (23082); FFIC/Allianz (23105) and Federal Insurance (23109) Join in the Objections of GEICO, Republic, Seaton and OneBeacon outlined herein.

**WR Grace:  
All Parties Trial Exhibit List - NOT Admitted Exhibits**

<u>Party</u>	<u>Ex. No.</u>	<u>Bates Span</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Confidential</u>	<u>Objections</u>	<u>Proffer</u>
Anderson Mem. Hosp.	AMH 044	AMH-4195- AMH-4195	05/07/1973	Invoice re Bags Zonolite MK sold to Stars Machine Co.	No	PP Obj: Relevance	
Anderson Mem. Hosp.	AMH 045	AMH-4196- AMH-4196	02/26/1973	Invoice re Bags Zonolite MK sold to Columbia Plastering Co. and shipped to Landmark Job.	No	PP Obj: Relevance	
Anderson Mem. Hosp.	AMH 046	AMH-4197- AMH-4197	07/00/1971	Invoice re Bags Zonolite MK sold to Ranger Construction Co. and shipped to St. Francis Hospital in Greenville, S. C.	No	PP Obj: Relevance	
Anderson Mem. Hosp.	AMH 047	AMH-4198- AMH-4198	00/00/1970	Invoice re 50# Bags Zonolite K MK sold to Columbia Plastering Co. and shipped to S. Carolina Nat'l Bank	No	PP Obj: Relevance	
Anderson Mem. Hosp.	AMH 048	AMH-4199- AMH-4199	05/00/1973	Invoice re Bags Zonolite MK sold to C. W. Kirkland Plastering Co. and shipped to Roper Hospital.	No	PP Obj: Relevance	
Anderson Mem. Hosp.	AMH 049	AMH-4200- AMH-4200	09/19/1972	Invoice re Bags Zonolite MK sold to Bank of America Corp. and shipped to First Federal Savings & Loan	No	PP Obj: Relevance	
Anderson Mem. Hosp.	AMH 050	AMH-4201- AMH-4205	03/04/2005	Email from Richard Finke to Dan Speights attaching Stipulation of the Debtors and Speights & Runyan Concerning the Treatment of Certain Asbestos Property Damage Claims Filed by Speights & Runyan	No	PP Obj: Relevance; Fed. R. Evid. 408; Hearsay; Best Evidence	

\*AXA Belgium (23082); FFIC/Allianz (23105) and Federal Insurance (23109) Join in the Objections of GEICO, Republic, Seaton and OneBeacon outlined herein.

**WR Grace:**  
**All Parties Trial Exhibit List - NOT Admitted Exhibits**

<u>Party</u>	<u>Ex. No.</u>	<u>Bates Span</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Confidential</u>	<u>Objections</u>	<u>Proffer</u>
Anderson Mem. Hosp.	AMH 051	AMH-4206- AMH-4207	03/17/2005	Email from Dan Speights to Richard Finke attaching revised Stipulation re claims being put on the shelf.	No	PP Obj: Relevance; Fed. R. Evid. 408; Hearsay; Best Evidence	
Anderson Mem. Hosp.	AMH 052	AMH-4208- AMH-4208	04/07/2005	Email from Dan Speights to Richard Finke re: Grace - "I just want to confirm that the ball is in your court."	No	PP Obj: Relevance; Fed. R. Evid. 408; Hearsay; Best Evidence	
Anderson Mem. Hosp.	AMH 054	AMH-4213.1- AMH-4213.62	09/25/2007	Estimation of the Number and Value of Pending and Future Asbestos-Related Injury Claims: WR Grace - Supplemental Report	No	PP Obj: Relevance	
Anderson Mem. Hosp.	AMH 056H	AMH-4215.155- AMH-4215.187	12/01/1995	Presentation re W.R. Grace BI and PD Future Cost Estimates	No	PP Obj: Relevance; Hearsay; Fed. R. Evid. 701-704; Best Evidence	
Anderson Mem. Hosp.	AMH 061	AMH-4234- AMH-4234	01/02/2009	Email from Dan Speights to Ed Westbrook re ZAI Settlement Agreement	No	PP Obj: Hearsay; Relevance; Fed. R. Evid. 408; Foundation; Best Evidence	
Anderson Mem. Hosp.	AMH 063	-	10/07/2009	Letter from Daniel Rourke Re His Unavailability	No	PP Obj: Relevance; Does not establish Dr. Rourke's unavaililbty to testify at the Confirmation Hearing	
Kaneb Pipeline	K68	K68-000001- K68-000003	00/00/0000	Affidavit of Fannie I. Minot, Esq. in Sulpport of Kaneb Pipe Line Operating Parnership, LP and Support Terminal Services, Inc.'s Reply to the Responses of Debtors, One Beacon America Inusrance Company, and Continental Casualty	No	PP Obj: Relevance; Hearsay	

\*AXA Belgium (23082); FFIC/Allianz (23105) and Federal Insurance (23109) Join in the Objections of GEICO, Republic, Seaton and OneBeacon outlined herein.



**WR Grace:  
All Parties Trial Exhibit List - NOT Admitted Exhibits**

<u>Party</u>	<u>Ex. No.</u>	<u>Bates Span</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Confidential</u>	<u>Objections</u>	<u>Proffer</u>
				Company to Kaneb Pipe Line Operating Partnership, LP and Support Terminal Services, Inc.'s Motion for an Order Modifying the Automatic Stay			
Libby Claimants	LC-276	-	00/00/0000	Graphic: Selikoff & Seidman (1991)		PP Obj: Reserved	
Maryland Cas. Co.	MCC EX. 04	-	03/15/2002	Debtors' Sur-Reply to Carol Gerard's Reply in Support of Her Motion to Clarify the Scope of, or in the Alternative, to Modify the Preliminary Injunction, p. 2 (Adv. Proc. No. 01-771; D.I. 92)	No	PP Obj: Hearsay; Relevance	To be admitted into evidence to prove that the Debtors took certain positions before, and made representations to, the Court upon which the Court relied in reaching a decision in a matter that has been fully adjudicated
Maryland Cas. Co.	MCC EX. 05	-	08/26/2002	Transcript of Hearing held on August 26, 2002 (D.I. 2670), p. 15	No	PP Obj: Hearsay; Relevance	To be admitted into evidence to show prior Court conclusions (in the context of adjudicating a contested matter) relating to The Libby Claimants' Allegations of "independent conduct" by MCC
Maryland Cas. Co.	MCC EX. 06	-	03/03/2003	Brief of Appellees [Debtors] (U.S. District Court, D. Del. C.A. No. 02-1549; D.I. 12), pp. 10-11, 25	No	PP Obj: Hearsay; Relevance	To be admitted into evidence to prove that the Debtors took certain positions before, and made representations to, the District Court upon which the

\*AXA Belgium (23082); FFIC/Allianz (23105) and Federal Insurance (23109) Join in the Objections of GEICO, Republic, Seaton and OneBeacon outlined herein.

**WR Grace:**  
**All Parties Trial Exhibit List - NOT Admitted Exhibits**

<u>Party</u>	<u>Ex. No.</u>	<u>Bates Span</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Confidential</u>	<u>Objections</u>	<u>Proffer</u>
							District Court relied in reaching a decision in a matter which has been fully adjudicated
Maryland Cas. Co.	MCC EX. 07	-	05/19/2009	MCC's Class 6 Asbestos PI Claims Ballot sent to Debtors' claims and balloting agent	No	PP Obj: Hearsay; Relevance	To be admitted into evidence to establish (i) MCC disputed its Class 6 classification and (ii) elected Class 9 treatment to the extent applicable
Maryland Cas. Co.	MCC EX. 08	-	05/19/2009	MCC's Class 6 Asbestos PI Claims Ballot (Provisional) sent to Debtors' claims and balloting agent	No	PP Obj: Hearsay; Relevance	To be admitted into evidence to establish (i) MCC disputed its Class 6 classification and (ii) elected Class 9 treatment to the extent applicable
Maryland Cas. Co.	MCC EX. 09	-	05/19/2009	MCC's Class 9 General Unsecured Claims Ballot (Provisional) sent to Debtors' claims and balloting agent	No	PP Obj: Hearsay; Relevance	To be admitted into evidence to establish (i) MCC disputed its Class 6 classification and (ii) elected Class 9 treatment to the extent applicable
Maryland Cas. Co.	MCC EX. 10	-	05/20/2009	MCC's Disputed Classification Declaration, dated May 20, 2009 (D.I. 21780)	No	PP Obj: Hearsay; Relevance	To be admitted into evidence to establish (i) MCC disputed its Class 6 classification and (ii) elected Class 9 treatment to the extent applicable

\*AXA Belgium (23082); FFIC/Allianz (23105) and Federal Insurance (23109) Join in the Objections of GEICO, Republic, Seaton and OneBeacon outlined herein.

**WR Grace:**  
**All Parties Trial Exhibit List - NOT Admitted Exhibits**

<u>Party</u>	<u>Ex. No.</u>	<u>Bates Span</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Confidential</u>	<u>Objections</u>	<u>Proffer</u>
Maryland Cas. Co.	MCC EX. 11	-	07/27/2009	Transcript of Hearing held on july 27, 2009 (D.I. 22674), p. 128-39	No	PP Obj: Hearsay; Relevance	To be admitted into evidence to reflect the Court's (i) views on BNSF's allegations that it has rights under Debtors' insurance policies; (ii) interpretation of a 1995 settlement agreement betweenDebtors and one of its insurers; and (iii) views on The Libby Claimants' allegations that they have "vested rights" in Debtors' settled insurance policies
Plan Proponents'	PP 255	PP 010315- PP 010462	04/01/2005	Renewed Motion For An Order Approving, Authorizing, And Implementing Settlement Agreement with Sealed Air (Dkt. 729; Adv. 02-2210)	No	OneBeacon / Seaton / GEICO / Republic Obj: Hearsay; Relevance	To be Admitted to prove that the Movants made certain allegations about the Settlement and the Settlement Agreement
Plan Proponents'	PP 256	PP 010463- PP 010466	04/21/2005	Debtors' Response To Renewed Motion For An Order Approving, Authorizing And Implementing Settlement Agreement with Sealed Air (Dkt. No. 738; Adv. 02-2210)	No	OneBeacon / Seaton / GEICO / Republic Obj: Hearsay; Relevance	To be Admitted to prove that the Debtors made certain allegations about the Settlement and the Settlement Agreement

\*AXA Belgium (23082); FFIC/Allianz (23105) and Federal Insurance (23109) Join in the Objections of GEICO, Republic, Seaton and OneBeacon outlined herein.

**WR Grace:**  
**All Parties Trial Exhibit List - NOT Admitted Exhibits**

<u>Party</u>	<u>Ex. No.</u>	<u>Bates Span</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Confidential</u>	<u>Objections</u>	<u>Proffer</u>
Plan Proponents'	PP 259	PP 013153-PP 013178	06/18/2007	Debtors' Tenth Motion for an Order Pursuant to 11 U.S.C § 1121(d) Extending Debtors' Exclusive Periods in Which to File a Chapter 11 Plan and to Solicit Votes Thereon (Dkt. 16083)	No	OneBeacon / Seaton / GEICO / Republic Obj: Hearsay; Relevance	To be Admitted to prove that the Debtors made certain statements about (i) Why exclusivity should be extended and (ii) the progress that has been made in the case
Plan Proponents'	PP 260	PP 013179-PP 013184	07/16/2007	Debtors' Limited Reply To Objections to Tenth Motion For An Order Extending Debtors' Exclusive Periods (Dkt. 16297)	No	OneBeacon / Seaton / GEICO / Republic Obj: Hearsay; Relevance	To be Admitted to prove that the Debtors made certain statements about (i) Why exclusivity should be extended and (ii) the progress that has been made in the case
Plan Proponents'	PP 353	PP 018242-PP 018262	05/16/2001	Affidavits of Publication of Commencement - (Dkt. 34 -Case No. 01-771 and Dkt. 275 - Case No. 01-1139)	No	OneBeacon / Seaton / GEICO / Republic Obj: Relevance	To be Admitted to prove the scope of the notice published regarding commencement of the case
Plan Proponents'	PP 354	PP 018263-PP 018273	04/01/2005	Certificate of Service re Renewed Motion for an Order Approving, Authorizing, and Implementing Settlement Agreement (Dkt. 729; Adv. 02-2210	No	OneBeacon / Seaton / GEICO / Republic Obj: Relevance	To be Admitted to prove which parties were served with a copy of the Motion and at what address
Plan Proponents'	PP 382	-	12/31/2000	The Babcock & Wilcox Company Consolidated Financial Statements for December 31, 2000 and 1999 and March 31, 1999		OneBeacon / Seaton / GEICO / Republic Obj: Hearsay; Relevance	To be Admitted to demonstrate the level of asbestos personal injury claims activity against Babcock & Wilcox before a bar date was set (page 17)

\*AXA Belgium (23082); FFIC/Allianz (23105) and Federal Insurance (23109) Join in the Objections of GEICO, Republic, Seaton and OneBeacon outlined herein.

**WR Grace:**  
**All Parties Trial Exhibit List - NOT Admitted Exhibits**

<u>Party</u>	<u>Ex. No.</u>	<u>Bates Span</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Confidential</u>	<u>Objections</u>	<u>Proffer</u>
Plan Proponents'	PP 383	-	12/31/2001	McDermott International, Inc. Form 10-K		OneBeacon / Seaton / GEICO / Republic Obj: Hearsay; Relevance	To be Admitted to demonstrate the level of asbestos personal injury claims activity in response to the Babcock & Wilcox bar date (page 153)

\*AXA Belgium (23082); FFIC/Allianz (23105) and Federal Insurance (23109) Join in the Objections of GEICO, Republic, Seaton and OneBeacon outlined herein.